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September 11, 2019

**VIA ECF FILING**

United States District Court  
Northern District of New York  
James T. Foley U.S. Courthouse  
445 Broadway  
Albany, NY 12207-2974

Att: Chief Judge Gary L. Sharpe  
Re: Jane Roe v. Union College, et al.  
Civil Action No. 1:19-CV-0909 GLS/CFH  
Our file: 30428

Dear Judge Sharpe:

This firm represents Union College and the Board of Trustees of Union College in the above-referenced matter. I entered an appearance in this matter on September 5, 2019 (Dkt. 11).

I have reviewed the plaintiff's Notice of Related Cases dated August 1, 2019 (Dkt. 6) and the Court's Order of Reassignment dated August 21, 2019 (Dkt. 7).

While the assignment of cases is within the sound discretion of the Court and the defendants have no objection to any judicial assignments made in this matter, it should be noted that the defendants do not agree with plaintiff's representation that "Jane Roe v. Union College (19-cv-909) and Doe v. Union College (19-cv-284-GLS-CFH) are related civil matters with substantial similarity of facts and legal issues ...".

Furthermore, the defendants do not agree or concede that the two cases referenced above are directly related.

The incidents giving rise to the complaints occurred in 2016 (Jane Roe v. Union College) and 2018 (Doe v. Union College).

While both plaintiffs make similar allegations, the facts, witnesses, policies and procedures, and College proceedings are separate and distinct.

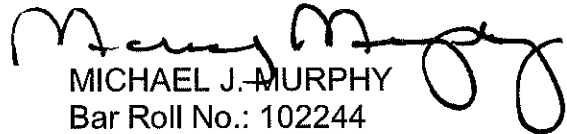
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Thank you for your consideration of this letter.

Respectfully submitted,



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MJM:amb

cc: **Via ECF Filing**

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